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FACT SHEET

US Syria Sanctions Relaxed for Organizations Providing Humanitarian Assistance

Nonprofit organizations in the United States can now offer services, ship material goods and donate funds to Northeast Syria in order to provide humanitarian assistance and development support to the five million Syrians living in the region and build the capacity of the Autonomous Administration of North and East Syria (AANES). The region, administered by the AANES, is outside the control of the Assad government. The Syrian Democratic Forces (SDF), allies of the US in the defeat of ISIS and the broader war on terror, provide regional security and enable the AANES to cultivate peace and security in this relatively stable region.

The Syria sanctions were relaxed on November 26, 2021, when the OFAC Amendment to General License, CFR Section 542.516, went into effect. This general license (GL) is often called an "exemption" to the sanctions. It allows for NGOs/nonprofit organizations to transact with entities in Syria to offer humanitarian aid, invest in non-commercial development projects, and generally conduct food/medical/education aid and assistance, as well as other activities.

Nonprofit organizations can conduct the following transactions:
- the provision of healthcare and health-related services (such as the restoration of health facilities; the distribution of medical equipment, supplies, and pharmaceuticals; and technical training for and supervision of healthcare workers);
- the provision of educational support and training services (such as the rehabilitation of local schools, the provision of training and equipment support to local educators, training and equipment support to local officials on the operations and management of critical infrastructure, and the provision of vocational and business management training);
- the provision of agricultural-related services (such as the refurbishment of mills, silos, and bakeries to improve food security; the provision of veterinary health services and pharmaceuticals to promote the health of livestock; and training and distribution of agricultural related items); and
- activities related to shelter and settlement assistance, and clean water assistance (such as the rehabilitation and restoration of conflict-damaged water systems, sanitation, and hygiene infrastructure; supplying associated spare parts, training, and support for maintenance of equipment; and rehabilitation of irrigation pumps and canals).

The relaxed sanctions also make banking easier. Nonprofit organizations are now permitted to access financial services, such as using their US bank accounts to pay for transactions, transfer funds in or out of Syria, or finance equipment rentals, to support their legal transactions. US-based NGOs may also now engage in new investment, such as a US-based NGO investing in water or irrigation systems, electrical infrastructure, or sanitation systems, to facilitate recovery in the semi-autonomous Northeast region of Syria.

The purpose of the GL is to permit transactions without the need for any further US government approval. No additional OFAC license is needed for applicable transactions. All shipments must still comply with basic international shipping and standard US export laws.

Here are some examples of the types of transactions that are permitted:
- A church group in the US can send funds to a Yezidi group for the purpose of restoring and protecting cultural/religious sites in the semi-autonomous Northeast region of Syria. Funds can be transferred via Western Union for legal humanitarian activities.
- A US 501(c) 3 nonprofit organization that installs solar panels can provide equipment, servicing, and funding to equip schools in the semi-autonomous region so children can stay warm and keep the lights on while they learn and play. The organization can transfer funds from its US bank account to a contractor in Erbil, Iraq or Qamishli, Syria, for example, to pay for its legal humanitarian activities. The US organization may hire a Syrian firm and pay that firm in USD or the Syrian pound.
- A US 501(c) 4 nonprofit organization can hold workshops in the semi-autonomous region on democracy. The organization can fund its activities from its US bank account.
- A US 501(c) 3 organization can purchase refined petroleum products of Syrian origin for use in Syria, such as gasoline for its leased vehicles that it will use in the semi-autonomous Northeast region to conduct its legal humanitarian activities.
- A US NGO can borrow funds from a US bank or another financial institution to finance its legal humanitarian activities in the Northeast region of Syria. In addition, the NGO can lend funds to individuals, groups, and organizations in Syria in support of its legal humanitarian activities.
- An unincorporated humanitarian organization in the US can raise funds for food assistance to support a refugee-camp-based organization in the Northeast region of Syria. These funds can be sent to the Syrian group via Western Union. The US organization may hire a Syrian firm and pay that firm in USD or the Syrian pound.
- Food aid or medicines can be shipped directly to the semi-autonomous region from an NGO in the US with logistics support coordinated through the AANES.

Many transactions still fall under the Syria sanctions and are prohibited. Prohibited transactions likely include: businesses selling infrastructure equipment outright to Syrians; non-humanitarian transactions with the Syrian government or any other Syrian entity; a US business wishing to sell its goods or services to the Syrian market; or a company wishing to contract to sell for-profit utilities to the Syrian market. As always, no transaction may involve any person on OFAC's Specially Designated Persons (SDN) list, whether or not the transaction is permitted under the GL or any other license.

US businesses and for-profit entities wishing to do business in the semi-autonomous northeast region of Syria are exempt from sanctions if they are working under a US government contract

or are organizations or businesses doing official business of the United Nations. In addition, special exemptions apply to health aid and activities to address the COVID pandemic.

The primary method for gaining approval for otherwise-prohibited transactions is to apply specifically for an exemption to the OFAC sanctions. For example, if a US company wishes to sell goods or services in the semi-autonomous region market, it must get a special OFAC license for its activities. These exemptions are difficult, but not impossible, to get.

The Syrian Democratic Council (SDC) encourages US organizations to make full use of the new sanctions exemptions in order to provide humanitarian assistance and development support to the semi-autonomous region of Syria administered by the AANES. The SDC has served as an important US ally in the Middle East. The US military is based in the semi-autonomous region and it trains and equips the SDF. The SDC hosts US diplomats, USAID officials, Western journalists and academics, and other US government personnel on a regular basis. The Northeast region requires humanitarian aid, stabilization funding, infrastructure development, and investment in order to recover from a decade of war and instability in Syria. The SDC office in the United States offers consultations, coordination and logistical guidance and support to any US organizations wishing to support entities in the region.

Please contact the SDC office in the US at info@syriandemocraticcouncil.us should you be interested to learn more about the new Syria sanctions exemptions and opportunities to support the Northeast region of Syria outside the control of the Assad government.

OFAC resources about Syria sanctions:
1) Press Release by Treasury Department on Syria Sanctions Amendment, Nov 24, 2021
2) Syria Sanctions FAQ #937
3) Syria Sanctions FAQ #938
4) Specially Designated Persons (SDN) List

For more information, contact the US office of the Syrian Democratic Council in Washington, DC: info@syriandemocraticcouncil.us.

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